FLEISCHMAN AND WALSH, L. L. P.

ATTORNEYS AT LAW
A PARTNERSHIP INCLUDING A PROFESSIONAL CORPORATION
1400 SIXTEENTH STREET, N.W.
WASHINGTON, D. C. 20036
TEL (202) 939-7900   FAX (202) 745-0916
INTERNET   www.fw-law.com

RECEIVED

1 1 2002

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

December 11, 2002

VIA ELECTRONIC FILING

Ms. Marlene Dortch
Secretary
Federal Communications Commission
236 Massachusetts Avenue, NE, Suite 110
Washington, D.C. 20002

> **Re:** **In the Matter of Review of Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers and Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, CC Docket Nos. 01-338; 96-98; 98-147**
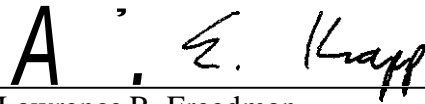
Dear Ms. Dortch:

On December 10, 2002, David Bogaty of WorldNet Telecommunications, Inc. ("WorldNet") and the undersigned met individually with Matthew Brill, Legal Advisor to Commissioner Abernathy, and Tom Navin, Robert Tanner, and Aaron Goldberger of the Wireline Competition Bureau. In these meetings, we discussed the Commission's examination of its UNE policies in light of the D.C. Circuit's *USTA* decision, and how the "impairment" analysis factors into the Commission's decision making. Additionally, we discussed the importance of UNE-P to WorldNet's ability to provide competitive telecommunications services in Puerto Rico, and to WorldNet's current migration to become a facilities-based carrier. WorldNet also emphasized that competition is nearly non-existent in Puerto Rico, and because of the unique characteristics of the island of Puerto Rico, the Commission should consider retaining UNE-P in Puerto Rico as a means of promoting facilities-based competition.

One electronic copy of this notice is being submitted for each of the referenced proceedings in accordance with the Commission's rules.

No. of Copies rec'd 0
List A B C D E

Respectfully submitted,

Lawrence R. Freedman
Aimee E. Knapp
Counsel for WorldNet Telecommunications, Inc.

Cc: Matthew Brill
        Tom Navin
        Robert Tanner
        Aaron Goldberger

152002v1